

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE: TERRORIST ATTACKS ON :
SEPTEMBER 11, 2001 : **03-MDL-1570 (GBD)(SN)**

This Document Relates To:

Ryan, et al. v. Islamic Republic of Iran, et al., 1:20-cv-00266 (GBD)(SN)

**DECLARATION OF DENNIS G. PANTAZIS IN SUPPORT OF
MOTION FOR ENTRY OF PARTIAL FINAL DEFAULT JUDGMENTS**

DENNIS G. PANTAZIS, Esquire, hereby states under penalty of perjury that:

1. I am an attorney with the law firm of Wiggins Childs Pantazis Fisher Goldfarb LLC, attorneys for Plaintiffs in the above-captioned matters. I submit this Declaration in support of this motion on behalf of Plaintiffs, the Estate of John J. Ryan and the Estate of Daniel L. Maher, in the action styled *Ryan, et al. v. The Islamic Republic of Iran, et al.*, 1:20-cv-00266 (GBD)(SN).

2. The form of this motion and the relief requested herein are intended to comply with the Court's prior Orders.

3. The form of this motion and the relief requested herein are also consistent with the form and relief requested and granted as to other Plaintiffs in this action.

4. The sources of my information are based on the Court record of the defaults and judgments entered by this Court prior to my retention. Those Orders are, *sub. nom. Ashton, et al. v. al Qaeda Islamic Army, et al.*, 02-cv-6987 (GBD)(FM): (1) Order of Judgment (1:03-md-01570, Doc. No. 3014, dated August 31, 2015); (2) Amended Order of Judgment (1:03-md-01570, Doc. No. 3226, dated March 8, 2016); (3) Memorandum Opinion and Order (1:03-md-01570, Doc. No. 3229, dated March 9, 2016); and (4) Order of Further Partial Judgment (1:03-md-01570, Doc. No.

3387, dated October 31, 2016). Any matters about which I lack personal knowledge are asserted herein upon information and belief.

5. The economic loss amounts set forth in Exhibit A are derived from the expert reports of economist Dr. Stan V. Smith, which are included in the attached Exhibit A. These comprise of economic loss expert reports for Plaintiffs, the Estate of John J. Ryan and the Estate of Daniel L. Maher, for whom economic loss damages have been sought in the accompanying motion filed herewith.

6. Exhibit A contains all of these economic loss reports on digital media with a copy being provided to the Clerk's Office and a copy being provided to Chambers. Due to the sensitive financial information contained in these documents, Plaintiffs, the Estate of John J. Ryan and the Estate of Daniel L. Maher, submit that they should remain off the public docket and under seal as has been the custom in other instances where this type of information has been submitted to the Court. Magistrate Judge Netburn had approved the filing of these materials under seal. (Doc. No. 5716).

7. Before filing this motion, I have (1) complied with the due diligence safeguards referenced in Section II.D. of the January 23, 2017 letter from the Plaintiffs' Executive Committees (Doc. No. 3433); and (2) personally verified that, based on my review of the records available to me regarding other judgments entered by this Court against the Islamic Republic of Iran and related defendants, no economic damages have previously been sought or obtained by Plaintiffs, the Estate of John J. Ryan and the Estate of Daniel L. Maher.

8. Accordingly, included with the motion is a proposed Order of Partial Final Judgment for Plaintiffs, the Estate of John J. Ryan and the Estate of Daniel L. Maher, conforming to the Court's previous orders.

Date: February 11, 2020

/s/ Dennis G. Pantazis
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